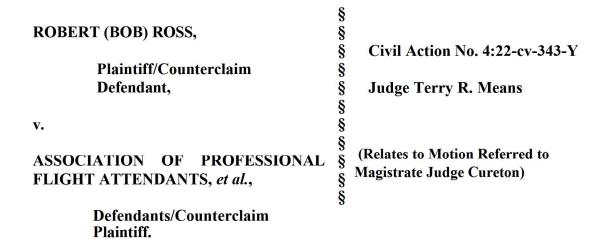
IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION



APPENDIX IN SUPPORT OF PLAINTIFF'S BRIEF IN SUPPORT OF SECOND MOTION TO COMPEL DEFENDANTS' PRODUCTION OF DOCUMENTS AND BRIEF IN SUPPORT

Plaintiff Robert "Bob" Ross, pursuant to Local Rules 7.1(i) and § C of this Court's Case

Management Requirements, submits this appendix of documents, and in support of

PLAINTIFF'S REPLY TO REPONSE IN OPPOSITION TO SECOND MOTION TO COMPEL

PRODUCTION OF DOCUMENTS.:"

<u>Item</u>	<u>Description</u>	Pgs.
1	Supporting Documents Referenced in Brief	1-41

Respectfully submitted, K.D. PHILLIPS LAW FIRM, PLLC

By: /s/ Kerri Phillips

Kerri Phillips

Texas Bar No. 24065906 Phone: (972) 327-5800

Email: kerri@KDphillipslaw.com

6010 W. Spring Creek Parkway Plano, Texas 75024 Fax: (940) 400-0089 For Service of Filings: notice@KDphillipslaw.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that the true and correct copy of this document was sent to all counsel of record, hereunder listed via ECF Filing on this the <u>1st</u> day of December 2023.

/s/ Kerri Phillips Kerri Phillips, Esq.

Jeffrey Bartos Guerrieri, Bartos, & Roma, P.C. 1900 M Street, NW, Suite 700 Washington, DC 20036

Tel: (202) 624-7400; Fax: (202) 624-7420

Email: jbartos@geclaw.com

Charlette Matts In-House Counsel for APFA 1004 West Euless Blvd Euless, TX 76040 Tel: (682) 301-8454

Cmatts@apfa.org

James Sanford 4803 Gaston Avenue Dallas, TX 75249-1020 Tel: (214) 800-5111; Fax: (214) 838-0001

Email jim@gillespiesanford.com

Email: joe@gillespiesanford.com

Michael Rake PO Box 1556 Lake Dallas, TX 75065-1556

Tel: (940) 498-2103 Fax: (940) 498-2103 Email: mrake1@mrakeattorney.com

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FT.WORTH DIVISION

ROBERT (BOB) ROSS	§	
Plaintiff,	§	
	§	
	§	
V.	§	
	§	
MCGAUGHEY, REBER AND	8	
ASSOCIATES, INC., ASSOCIATION	8	
OF PROFESSIONAL FLIGHT	§	Case No.
ATTENDANTS, JULIE HEDRICK,	§	
AND ERIK HARRIS	8	
Defendants.	§	

AFFIDAVIT OF NENA MARTIN IN SUPPORT OF PLAINTIFF'S ORIGINAL COMPLAINT AND MOTION TO VACATE

BEFORE ME, the undersigned authority, on this day personally appeared Nena Martin, who being by me first duly sworn, did state:

- 1. "I am employed as a Flight Attendant working with American Airlines, Inc. and I served on the Board of Directors for the Association of Professional Flight Attendants, between April 2011 to January 2021. I am of sound mind and body to make this affidavit and have personal knowledge of the following facts:
 - a. I attended the Board of Director's meetings on October 27, 2020, and October 28, 2020, in which evidence from an accounting firm hired by APFA was presented off the record. Erik Harris presented spreadsheets he stated were the results of an accounting review that showed Robert "Bob" Ross owed for an overpayment made under his Transition Agreement in the amount of \$5,436,47.

- I was present at this meeting and reviewed all documents submitted and can attest to the true and correct findings of the Board of Directors at this time.
- b. I have not seen the Confidential Memorandum dated October 22, 2020, from Wood, Stephens & O'Neil, L.L.P ("Confidential Memorandum") and the Board of Directors were not presented this Confidential Memorandum at any formal APFA Board of Directors meeting or discussion with which I participated.
- c. I received an email from Erik Harris on November 25, 2020, with a letter attached. A true and correct copy of that letter is attached hereto and marked Exhibit B-1. This information was presented to me on or about October 27, 2020, with the other Board of Directors while discussing it off the record. No formal vote was ever made, no formal record ever taken. It was decided that APFA General Counsel, Margo Nikitas, would call and discuss the accounts with Mr. Ross to review the spreadsheet.
- d. I also attended the APFA Executive Committee meeting on December 1, 2020, where the Executive Committee reviewed the charges filed by Melissa Chinery-Burns and Sandra Lee against Robert "Bob" Ross. At this Executive Committee meeting, I had the opportunity to hear all arguments made against Robert Ross prior to the Executive Committed voting on whether the charges were timely, specific, and valid. The Confidential Memorandum dated October 22, 2020, from Wood, Stephens & O'Neil, L.L.P was never presented to the Executive Committee for review and consideration prior to voting on the charges."

Casse44222evve0033433YP DDocumeent1374.4 Fifeited. 2/14/11/2/22 P. Raggel 6 3 fo 44 Paggel D 35579

FURTHER AFFIANT SAYETH NOT.

Nena Martin

SWORN AND SUBSCRIBED TO before me on this 18 day of April 2022.

MOTARY SEAL #20661406

OF MISSONIA

Notary Public, State of Missouri

From: Erik Harris <eharris

Sent: Wednesday, November 25, 2020 9:58 AM

To: Base Presidents < BasePresidents >; Executive Committee

< Executive Committee

Cc: Margot Nikitas <MNikitas

Subject: Bob Ross' Overpayment

Hi all-

The attached letter was sent to Bob Ross yesterday in regards to the Overpayment of wages. I gave him a deadline of January 1, 2021 to cure the debt owed to APFA or to make payment arrangements.

As always, I will keep you all posted on the progress of collecting these funds.

Thanks,

Erik

__

Erik Harris Pronouns: he, him, his

National Treasurer

Association of Professional Flight Attendants

The content of this email is intended solely for the recipient(s). It is not to be shared, forwarded or posted without the author's written consent.

Exhibit B-1

Casse44222eove0033433YP Dojocumeent137-4.5 Filifeited. 2/40/11/9/22 P. Rogge 2 fo4-6 Praggel 10 36601

Association of Professional Flight Attendants

Representing the Flight Attendants of American Airlines

November 24, 2020

Via Email and Return Receipt Certified Mail #7019 1120 0000 0179 3144

Mr. Bob Ross 4701 Hayloft Ct El Dorado Hills, CA 95762

RE: Overpayment of Wages

Dear Mr. Ross:

I am sending this letter to follow-up on our telephone conversation on November 10, 2020. During our call, we discussed the finding of the APFA Board of Directors that you were overpaid in the amount of \$5,436.47 in 2018. The Board's finding was based on the results of a review from an independent accounting firm which determined that the formula used to determine the daily rate for your sick and vacation payout was incorrect. (See Schedule C, enclosed).

On or before January 1, 2021, please remit payment (via check, money order, cashier's check, or credit card) to APFA in full or contact me to discuss payment arrangements.

Please contact me at 817.540.0108 or eharris@apfa.org with any questions or concerns. Thank you for your prompt cooperation.

Sincerely,

Erik Harris

National Treasurer

Enclosure

CC: APFA Board of Directors

APFA Executive Committee Margot Nikitas, General Counsel

Exhibit B-1

1004 West Euless Blvd • Euless, Texas 76040

Tel: (817) 540-0108 • Fax: (817) 540-2077 • www.apfa.org

8,280.08

8,840.36

Α

Bob Ross - National President Pay

116 hours paid monthly at the highest purser pay including international overide, per the policy manual.

*	Maximum flight attendant pay	60.13	
	Purser Pay	7.50	
	International pay	3.75	
	12 550	71.38	116 hours

	BI-monthly pay 4/1/16 - 12/31/16		4,140.04
*	Maximum flight attendant pay	61.33	
	Purser Pay	7.50	
	International pay	3.75	
	U. 12	73 EQ 116 hours	0 410 70

Bi-monthly pay - 1/1/17 - 5/1/17		4,209.64
	101,031.36	Annual salary
	276.80	Daily rate for sick and vacation

***	Maximum flight attendant pay	64.96	
	Purser Pay	7.50	
	International pay	3.75	
		76.21	116 hours

Bi-monthly pay - 5/2/17 - 12/31/17		4,420.18
		Annual salary
1	290.64	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26	
Purser Pay	7.50	
International pay	3.75	
	77.51 116 hours	8.991.16

Bi-monthly pay - 1/1/18 - 7/31/18		4,495.58
	107,893.92	Annual salary
	295.60	Daily rate for sick and vacation

^{*} Pay rates effective 4/1/16

Exhibit B-1

^{**} Pay rates effective 1/1/17 - 5/1/17

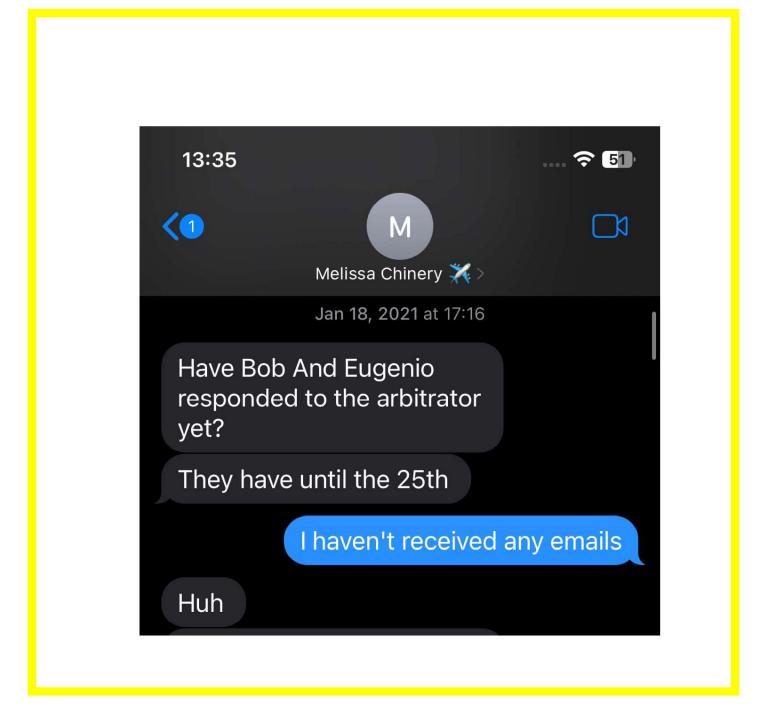
^{***} Pay rates effective 5/2/17 - 12/31/17 (1.6% Increase)

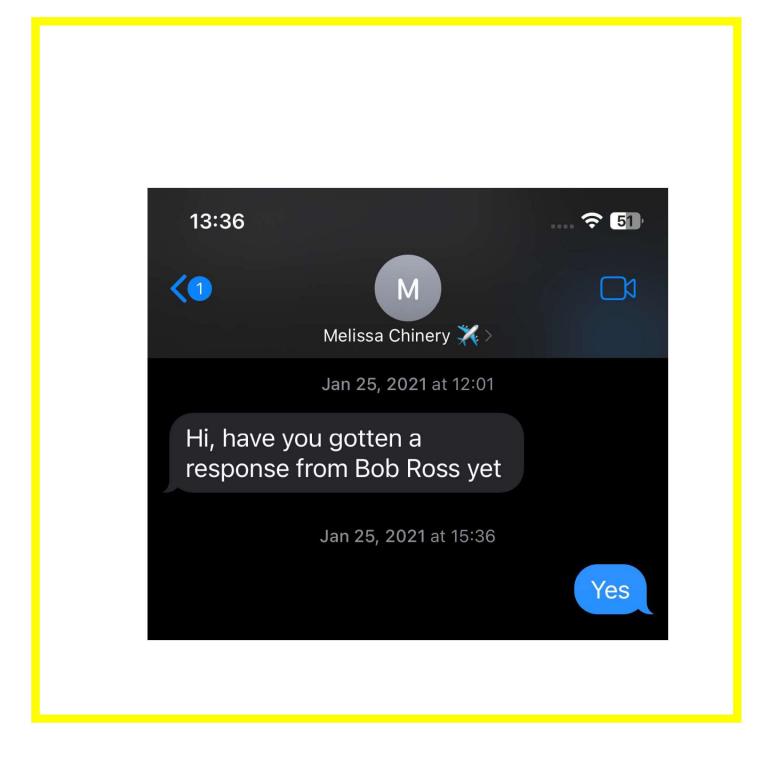
^{****} Pay rates effective 1/1/18 - 7/31/18

			8				
National Officer:	Bob Ross	155					
		Annual	California by 2007	Daye to pay	Darmant		
	-	201017	(divide by 500)	Days to pay	rayment		
Profit Sharing - 2016	, -				2,652.22	(paid 3/10/17)	7
Vacation Pay - 2017							
		\$ 101,031.36	276.80	14	3,875.20	(paid 3/31/17)	
Sick Pay - 2017	+						
	-	\$ 101,031.36	276.80	12	3,321.60	(pold 3/31/17)	
Retro - Wage Arbitration Award 1.	Award 1.	%9			918.72	(paid 6/1/17)	
Triple Play Grand Slam					300.00	(poid 7/6/17)	1
Grand slam					150.00	(poid 1/25/18)	
(Additional \$50	grand sla	(Additional \$50 grand slam paid on 2/15/18 salary check)	salary check)				
2071 Profit Sharing	-				2,458.19	(paid 3/9/18)	
Vacation & Sick Pay - 2017 - (adjustment paid in 2018)	17 - (adjus	tment paid in 2018			968.76	(pold 3/29/2018)	
Vacation Pay - 2017 (remaining unused days per agreement)	naining un	used days per agree	ement)				
		\$ 114,632.67	314.06	17	5,339.02	(pold 3/29/2018)	
Vacation pay - 2018 (remaining unused days per agreement)	naturing un	used days per agree	sment)				
		\$ 122,121.70	334.58	29	9,702.82	(pald 3/29/2018)	
		(Paid in two check	s in the amount	(Paid in two checks in the amount of \$4,851.41 each)	(
Sick Pay - 2018							
		\$ 122,121.69	334.58	12	4,014.96	(paid 3/29/2018)	
End of Term Payout - 2017 (January	17 (Januar	y 1 - December 31, 2017)	2017)				
		1	334.58	35	11,710.30	11,710.30 (paid 3/29/2018)	
		(Paid in two check	ts in the amount	(Paid in two checks in the amount of \$3,903.43 each and one for \$3,903.44)	and one for \$3,	903.44)	
End of Term Payout - 2018 (Januar)	18 (Januar	/1-Ju					
			334.58	20.44	6,838.82	(paid 3/29/2018)	
		(Paid in two check	s in the amount	(Paid in two checks in the amount of \$3,419.41 each)			
Profit sharing 2018					1,403.99	1,403.99 (paid 3/8/19)	

Nationa	National Officer:	Bob Ross		Overpayment Calculation	Calculation			
			Annual	Daily amount	Eligible			
			Salary	(divide by 365)	Days to pay	Pay	Payment	
Vacation Pay - 2017	Pay - 2017							
	Original amount	t	\$ 101,031.36	276.80	14	43-	3,875.20	OK (paid 3/31/17)
					Overpayment	S	•	•
Sick Pay - 2017	2017							
	Original amount	-	\$ 101,031.36	276.80	12	\$	3,321.60	OK (paid 3/31/17)
					Overpayment	v		
Vacation	& Sick Pay - 201	Vacation & Sick Pay - 2017 - (adjustment paid in 2018all paid in error)	in 2018all paid i	n error)	Overpayment	\$	968.76	\$ 968.76
Vacation	Pay - 2017 (rem	Vacation Pay - 2017 (remaining unused days per agreement)	per agreement)					
	Original amoun	Original amount - paid in error (a)	\$ 114,632.67	314.06	17	*	5,339.02	(paid 3/29/2018)
	Correct calculation amount	ion amount	\$ 101,031.36	276.80		*	4,705.60	
					Overpayment	\$	633.42	\$ 633.42
Vacation	Pay - 2018 (rem	Vacation Pay - 2018 (remaining unused days per ag	per agreement)					
	Original amoun	Original amount - paid in error (a)	\$ 122,121.70	334.58	29	45	9,702.82	(paid 3/29/2018)
	Correct calculation amount	ion amount	\$ 107,893.92	295.60	29	\$	8,572.40	
					Overpayment	\$	1,130.42	\$ 1,130.42
Sick Pay - 2018	2018							
***	Original amoun	Original amount - paid in error (a)	\$ 122,121.69	334.58	12	\$	4,014.96	(paid 3/29/2018)
	Correct calculation amount	tion amount	\$ 107,893.92	295.60	12	\$	3,547.20	
					Overpayment	S	467.76	\$ 467.76
End of ter	m payout - 201	End of term payout - 2017 (January 1 - December 3	nber 31, 2017)	The second secon				
	Original amoun	Original amount - paid in error (a)	\$ 118,046.02	334.58	35	\$	11,710.30	(paid 3/29/2018)
	Correct calculation amount	ion amount	\$ 107,893.92	295.60	35	\$	10,346.00	
					Overpayment	\$	1,364.30	\$ 1,364.30

	1		796.75	5,361.41 **	75.06 (based on 1.4%)	36.47	
	6,838.82 (poid 3/29/2018)		\$	\$ 5,3	w	\$ 5,436.47	
	6,838.82	6,042.06	796.75	-	*		
	S	÷	w	- ibtot	pove		
	20.44 \$	20.44 \$	Overpayment	Overpayment subtotal	excess amount a	PFA	
	334.58	295.60			d (3/8/2019) on e	ent - due to A	
2018)	\$ 118,046.02	\$ 107,893.92			Add 2018 profit-sharing contribution paid (3/8/2019) on excess amount above **	Total overpayment - due to APFA	
ıly 31,	(a)				fit-sha		
End of term payout - 2018 (January 1 - July 31, 2018	Original amount - paid in error (a)	Correct calculation amount			Add 2018 pro		(a) - included union pay (MEA/SAF)





From: "John Nikides" </
O=EXCHANGELABS/
OU=EXCHANGE
ADMINISTRATIVE GROUP
(FYDIBOHF23SPDLT)/
CN=RECIPIENTS/CN=JOHN
NIKIDES>

Subject: Re:

Date: Nov 28, 2021 at 11:34:36 AM

Hi, Melissa...

This effort by Mr. Ross to insert company authority into an internal union process in order to silence and avenge a member was clearly meant to eviscerate your rights as an APFA member, and this cannot be ignored by the Board of Directors.

Mr, Ross's repeated threats to those of us who dare question anything related to his monies owed...and related issues... as well as his temper tantrums; rants; shouting and name-calling...are all well-known within APFA, but have been largely ignored.

The revelation of this latest travesty is

just too much to ignore.

The silence by the majority of the BOD to this point on any outstanding issue related to Bob Ross has seemingly led him to believe that he can do as he pleases. This cannot he allowed to continue.

I have repeatedly asked questions...on

Board calls and in meetings...related to:

- 1. the overpayment;
- 2. a pending lawsuit relative to that overpayment;
- 3. excessive contributions by the Association to his APFA 401K while in office.

Rather than providing proof in the form

of factual evidence which might otherwise verify his self-professed innocence, Mr. Ross has attempted to simply erase his debts via the use of threats; by endeavoring to squash all discussion through obstreperous behavior and now...by apparently running to the company for protection.

John Nikides

APFA LAX Base President

Sent from my iPad

On Nov 27, 2021, at 4:54 PM, melchinery@aol.com wrote:

Dear APFA Board of Directors:

At our recently concluded Article VII hearing SFO base president Bob Ross testified he had turned in Sandra Lee and myself to American Airlines management for our work in exposing his theft of APFA property and funds. As a base president and a member of your

board of directors, it is highly improper for Mr Ross to involve the Company in our union business. As a body, what steps are you willing to take against one of your members who is retaliating against members who are trying to rid this organization of corruption?

At the hearing, Mr Ross admitted to having a rental car which was used by him and his wife. This is not just a

violation of policy but constitutes theft of union resources in the amount of thousands of dollars. It was also established that Bob Ross took Laura Gladding's and Marcus Gluth's furniture. It is time for the APFA Board of Directors to take action to police your own members. Each one of you, as the highest body of this organization have an obligation to safeguard union funds. Yet for years. many on the board have

turned a blind eye to corruption, content to sweep this under the rug. It is time for the APFA board to step up and address these longstanding issues.

Sincerely,

Melissa Chinery Sandra Lee

c

h e c o 1

d b e r e c



From: Bob 2 Redacted by Plaintiff

Date: Tuesday, March 9, 2021 at 8:13 AM

To: Tim Schwartz Redacted by Plaintiff, Amber De Roxtra Redacted by Plaintiff, Randy Trautman Redacted by Plaintiff, John Nikides Special Redacted by Plaintiff, Mischel Babi Redacted by Plaintiff, John Pennel Redacted by Plaintiff Scott Hazlewood Shazlewood@apfa.org>, Robert Norvell Redacted by Plaintiff Kim Kaswinkel Redacted by Plaintiff, Amy Milenkovic Redacted by Plaintiff, Susan Wroble Redacted by Plaintiff>

Cc: National President Redacted by Plaintiff National Treasurer Redacted by Plaintiff, Larry Salas Redacted by Plaintiff, National Secretary Redacted by Plaintiff, National Secretary Redacted by Plaintiff

Subject: Letter the Board

Base Presidents,

In response to yesterdays Treasurers Report, I have on several occasions, attempted to contact the Collection agency with the information given to me by Erik Harris, Diversified Credit Systems. After several attempts to contact this agency, I was told they do not have any account in my name or from APFA in my name

I am requesting that my account be withdrawn from any collections agency and any negative reporting to credit agencies be reversed as evidence of good will until all facts and/or an affordable payment plan can be established. I would like access to records to confirm I was paid per our resignation agreement, any balance be agreed to by both parties and a proper and affordable payment plan be established to make APFA whole. I believe this is not asking too much but is all I've been asking for since this all started.

It is import for the BOD to know I had nothing to do with the method or calculations used in my unused sick and vacation days and would have preferred this issue have been addressed when the other Officers were notified. I was told by Craig Gunter, the former APFA National Treasurer and the former APFA attorney Mark Richard, well over a year ago, that my calculations were correct.

At no time have I ever stated that I "refuse" to pay or reimburse APFA, as has been stated. I did not address this on the record yesterday as that would violate my privacy and my family personal interests. I am asking the BOD to work with me on this issue as there is only now policy and was no such policy for sending incidents like this to collections with only 30 day notice without hearing the member's disputes and without full knowledge of facts in the case.

I would also like to applaud and support Erik Harris' effort to rectify APFA's financial situation, considering the state of financial devastation he walked into. I am asking the BOD's support in rectifying any misunderstandings and allow us to work out an equitable payment plan based on all known facts and calculations. I would also like to set up a meeting with Erik Harris and APFA Legal Counsel, Margot Nikitas to review the calculations on my monies owed.

In Unity.

Bob Ross

Bob Ross SFO Base President-Elect

Association of Professional Flight Attendants (APFA)

Representing the Flight Attendants of American Airlines

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diversifiedcrediRedacted by Plaintiff

From:

Tom Reber < diversifiedcredit Redacted by Plaintiff

Sent:

Wednesday, April 14, 2021 11:55 AM

To:

'Erik Harris'

Subject:

RE: Letter the Board

Hi Erik.

Our supervisor talked to Mr. Ross. He is stating he's on the board of A.P.F.A.? Also, he said that he did not receive our letter with the dispute verification. He now lives in California. When we talked to him previously he verified his address. Our supervisor updated his address information and we are re-sending the information. He stated that he is trying to refinance his home. It sounds like he may pay the account but it seems he may be stalling as well.

We will keep on top of the account.

Thanks,

Tom

Thomas L. Reber
VP of Operations

DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606

(800) 256-3838 National (903) 753-1215 Fax www.dcscollect.com

From: Erik Harris Redacted by Plaintiff

Sent: Tuesday, April 13, 2021 4:00 PM

To: Tom Reber < diversifiedcredit Redacted by Plaintiff

Subject: Re: Letter the Board

Hi Tom,

Any updates from Mr. Ross? Would you mind just sending me a note when he does correspond, that way I won't keep bugging you.

Thanks,

Erik

Erik Harris Pronouns: he, him, his National Treasurer

Association of Professional Flight Attendants

Redacted by Plaintiff

.... someth of this arrian is intended solely for the recipient(s).



From: Tom Reber < diversifiedcredit Redacted by Plaintiff

Date: Tuesday, March 9, 2021 at 2:05 PM To: Erik Harris < eharris Redacted by Plaintiff

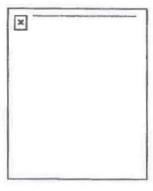
Subject: RE: Letter the Board

Thanks Erik,

We've updated his file with the phone numbers and forwarded it to a collector to call him.

Thanks,

Tom



Redacted by Plaintiff

From: Erik Harris <eharris@

Sent: Tuesday, March 9, 2021 1:30 PM

To: Tom Reber < diversifiedcredi Redacted by Plaintiff

Subject: Re: Letter the Board

Thanks for the update Tom. The phone numbers I have for Bob is (916) 284-2402 and (817) 983-4646.

Much appreciated!

Erik Harris Pronouns: he, him, his

National Treasurer

Association of Professional Flight Attendants

OfficeRedacted by Plaintiff

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It is not to be shared, forwarded or posted without the author's written consent.

Redacted by Plaintiff

From: Tom Reber < diversified crea

Date: Tuesday, March 9, 2021 at 9:26 AM

To: Erik Harris < eharris Redacted by Plaintiff

Subject: RE: Letter the Board

Hi Erik,

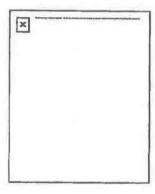
We do have Mr. Ross in our system and our notes do not reflect that he has contacted our office. Our phones are answered by a live person Monday-Thursday from 8:30 a.m. to 8:00 p.m. and Friday from 8:30 a.m. to 5:00 p.m. Voicemails that are left after hours are checked daily and distributed to collectors for callbacks. We do not have a phone number for Mr. Ross but have sent him letters.

Redacted by Plaintiff

He can reach us at (800

Thanks,

Tom



Redacted by Plaintiff

From: Erik Harris < eharrise

Sent: Tuesday, March 9, 2021 8:50 AM

To: Tom Reber < diversifiedcredit Redacted by Plaintiff

Subject: FW: Letter the Board

Hi Tom,

I received the following message from Bob Ross regarding his account. Do you have any record of him contacting your office? He claims he has made several attempts to reach you and is now disputing the debts on that basis. Additionally, he claims that it has already hit his credit report which can't be true because you told me it doesn't hit his credit until after 60 days.

I need to brief the Board of Directors so they know how best to respond to this email.

Thanks,

Erik

Erik Harris Pronouns: he, him, his

National Treasurer

Association of Professional Flight Attendants

office Redacted by Plaintiff

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It is not to be shared, forwarded or posted without the author's written consent.



From: Bob 2 < bobrossapf Redacted by Plaintiff
Date: Tuesday, March 9, 2021 at 8:13 AM
To: Tim Schwartz <tschwart <a="" amber="" by="" de="" deroxtra="" plaintiff="" plaintiff<="" redacted="" roxtra="" td=""></tschwart>
<rtrautman@< p=""> >, John Nikides <inikide!redacted <mbabi@anfa.org="" by="" plaintiff_dischel="" rabi="">, John Pennol</inikide!redacted></rtrautman@<>
<ipennel by="" p="" plaintiff<="" redacted=""> , Scott Hazlewood <shazlewood@apfa.org< p=""> Redacted by Plaintiff <moverlighted< p=""> Kim</moverlighted<></shazlewood@apfa.org<></ipennel>
Kaswinkel < kkaswinkel@Redacted by Plaintiff >, Amy Milenkovic < amilenkov Susan Wroble
Redacted by Plaintiff Redacted by Plaintiff
Cc: National President < president Redacted by Plaintiff National Treasurer < treasurer Redacted by Plaintiff Larry Salas
<u>Island:</u> In the secretary secretary secretary Margot Nikitas (Redacted by Plaintiff
Subject: Letter the Board

Base Presidents.

In response to yesterdays Treasurers Report, I have on several occasions, attempted to contact the Collection agency with the information given to me by Erik Harris, Diversified Credit Systems. After several attempts to contact this agency, I was told they do not have any account in my name or from APFA in my name

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In Unity,

Bob Ross

Bob Ross SFO Base President-Elect

Association of Professional Flight Attendants (APFA)

Representing the Flight Attendants of American Airlines

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Redacted by Plaintiff

diversified credit(

From:

Redacted by Plaintiff

Sent:

Tom Reber < diversifiedcred Monday, March 1, 2021 11:32 AM

To:

'Erik Harris'

Subject:

RE: New Account Placement

Hi Erik,

I'll be sure to copy you on the status report each month. If you have any questions on statuses you're not sure of, I'll be more than happy to explain what they mean. Let me know which ones you need clarification on.

Hope you had a great weekend.

Tom

Thomas L Reber VP of Operations

DIVERSIFIED CREDIT SYSTEMS PO 80x 3424 Longview, TX 75606

> (800) 256-3838 National (803) 753-1215 Fax Vnww.doscollect.com

From: Erik Harris <eharris

Sent: Saturday, February 27, 2021 1:40 PM

To: Tom Reber < diversified cred Redacted by Plaintiff

Subject: Re: New Account Placement

Hey Tom-

This is awesome! Would you mind copying me in on these status updates going forward? Also, do you have a list of what all the status codes mean in the process? I can see in the status description but I don't know exactly what each one mean. Some are very clear and self explanatory but some I'm not sure.

Thanks,

Erik

Erik Harris Pronouns: he, him, his

National Treasurer

Association of Professional Eliabt Attandanta

Redacted by Plaintiff

It is not to be shared, forwarded or posted without the author's written consent.

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Debtor 003116136 4:22-cv-00343-Y Document 174 Filed 12/01/129 Page 39 of 44 PageID 3502
Strategy 52 Step 10 Status ATA Original
                                                 $5,436.47
                                                            Current
                                                                          $5,436.47 Paid
                                                                                                   $0.00 Paid in Pull? No
 Name: ROSS, BOB
                                      Is mail return? No Seen Since last NBIZ or NEWCOL? No
 Addr1 Redacted by Plaintiff
                                       Has AS window? No
                                                                          Don't call work: No
                                       With Attorney? No
                                                                         Don't write work: No
 Addr3
                                      With Forwarder? No
                                                                          Don't call home : No
C/S/Z:
                                        Is a precoll? No
AT - ADDITIONAL INFO
                                      MI - Miscellaneous Info
                                                                            NI - Numeric Identity
                                                                              ssn: Redacted by Plaintiff
Ad Inf: MBA/SAF
                                       MISCI: THIS IS FOR OVERPAYMENT OF
                                       Misc2: WAGES
                                                                            D.O.B.:
                                                                            DryLic:
        ANOTHER # Redacted by Plaintiff
                                        More: PER CL DBTR IS VERY AGRESSIVE
                                                                             More:
                                      OrgCli: AND TENDS TO FABRICATE
                                                                              More:
OA - OLD ADDRESS
OLD ST: Redacted by Plaintiff
OLD CT:
MISC :
MISC :
MISC :
Debt 001 Client 01-008235 Cli Ref 3116136/001210129
                                                                                           RCVD 01/29/21 Batch 10-304
                                                       Por
                                                                    $0.00 DLP 00/00/00 Cli_DLC 01/29/21 Cli_DLP 00/00/00
            $0.00 Agcy
                                $0.00 Fee 0030 Paid
                                                                               Orig Reported 04/29/21 Last reported 04/28/22
Last Interest 00/00/00
                               Credit Bureau Status: Closed
                                                                               Comments on Debt:
 Serv 00 PMTH 00
                       Balance
                                         Paid
                                                         Cancel? No
                      $5,436.47
                                          $0.00
                                                 PIF 1 payment? No
       Principal:
                                                    Old Account? No
Bounced Check Fee:
                          $0.00
                                          $0.00
        Interest:
                          $0.00
                                          $0.00
                                                     Reinstated? No
    Court Charges:
                                                    Returned how?
                          $0.00
                                          $0.00
                                                   Ever Mail Ret? No
Collection Charge:
                          $0.00
                                          $0.00
                                                 Legal Status - None
                                          $0.00
Equipment Charges:
                          $0.00
Contact History:
AC/RE SEQ CONTACT TIME USER COLLECTOR A QUE DATE
                                                         AMOUNT
                                                                        COMMENTS
Se/en 000 04/12/23 10:52 TLR
                                      2 00/00/00
                                                           $0.00
                                                           $0.00
Se/en 000 04/12/23 10:08 TLR
                                      2 00/00/00
Se/en 000 04/11/23 10:51 TLR
                                      2 00/00/00
                                                           $0.00
Se/en 000 04/04/23 13:01 TLR
                                      2 00/00/00
se/en 000 03/27/23 10:56 TLR
                                       2 00/00/00
                                                           $0.00
                                                           $0.00
Se/en 000 06/27/22 11:42 TLR
                                      2 00/00/00
                                                           $0.00
Se/en 000 06/14/22 10:02 ARE
                                       2 00/00/00
                                      2 00/00/00
                                                           $0.00
Se/en 000 06/13/22 13:12 TLR
Se/en 000 06/09/22 15:13 TLR
                                      2 00/00/00
                                                           $0.00
Se/en 000 06/09/22 15:00 ARE
                                                           $0.00
                                       2 00/00/00
Se/en 000 06/09/22 14:54 TLR
                                       2 00/00/00
                                                           $0.00
                                                           $0.00 136/12
Ch/sg 000 06/09/22 13:47 TLR
                                       2 00/00/00
                                                           $0.00 ACT New:ATA
Ch/St 000 06/09/22 13:47 TLR
                                       2 00/00/00
Se/en 000 06/02/22 18:05 TLR
                                       2 00/00/00
                                                           $0.00
Se/en 000 06/02/22 14:23 LRW
                                                           $0.00
                                       1 00/00/00
Se/en 000 06/01/22 11:47 TLR
                                       2 00/00/00
                                                           $0.00
                                                           $0.00
                                                                 REPORTED
Ch/Cb 001 04/28/22 10:14 TLR
                                       2 00/00/00
Se/en 000 03/24/22 11:55 TLR
                                       2 00/00/00
                                                           $0.00
                                                           $0.00
                                                                 MIKE RAKE ATTY IS HANDLING, SUIT HAS BEEN FILED
CO/ 000 03/01/22 08:54 TLR
                                       2 00/00/00
                                                           $0.00
                                                                 01-0145
Ch/Co 000 03/01/22 08:54 TIR
                                       2 00/00/00
Se/en 000 01/20/22 10:00 LRW
                                       1 00/00/00
                                                           $0.00
Se/en 000 11/24/21 18:05 LRW
                                       1 00/00/00
                                                           $0.00
                                                                 MIKE RARE ATTY IS HANDLING ACCOUNT
                                                           $0.00
CO/ 000 11/02/21 12:53 TLR
                                       2 00/00/00
                                                           $0.00
                                       2 00/00/00
Se/en 000 11/01/21 15:00 TLR
                                                           $0.00
                                       2 00/00/00
Se/cn 000 10/27/21 14:36 LRW
                                                           $0.00
                                                                  REPORTED
                                       1 00/00/00
Ch/Cb 001 10/27/21 13:19 TLR
                                                           $0.00
                                       1 00/00/00
Se/en 000 10/27/21 11:50 TLR
                                                           $0.00
TR/LM 000 10/27/21 11:47 LRW
                                       2 00/00/00
                                                                  TEXT FROM TOM- CALL BOB ROSS
RL/GI 000 10/27/21 11:47 LRW
                                       2 00/00/00
                                                           $0.00
                                                           $0.00
Se/en 000 10/27/21 11:44 TLR
                                       2 00/00/00
```

APFA VI. - 000056

Se/e	en 000	08Gas	e 4:2	2-c\	/-00343	-Y,	Documer	nt 174 . F	Filed 12/01/23 Page 40 of 44 PageID 3503	
		08/28/2					00/00/00	L. *		
		08/28/2					00/00/00	\$0.00		
		08/25/2					00/00/00	\$0.00	SENT TEXT TO TOM TO SEE IF OK TO CALL	
		08/23/2					00/00/00	\$0.00	DRTD CAVE ADEA WILL MOR DICOU DE MUZE DAY	
						100	00,00,00	40.00	DBTR SAYS APFA WILL NOT DISCU SS THIS BAL . CANNOT PAY UNTI	
TR/L	M 000	08/23/2	1 11:0	LRW		1	00/00/00	\$0.00	L HE IS ABLE TO TALK TO APPA. WANTS TO TALK TO APPA	
		08/20/2					00/00/00	\$0.00		
		08/20/2					00/00/00	\$0.00		
		08/19/2					00/00/00	\$0.00		
RM/					01-0145		08/23/21	\$0.00	CALL HIM	*
TR/L		08/19/2					00/00/00	\$0.00	Annual Maria	*
TR/L	M 000	08/18/2	12:36	LRW			00/00/00	\$0.00		*
		08/18/2					00/00/00	\$0.00		+
RM/	000	08/17/2	18:09	LRW	01-0145		08/18/21	\$0.00		4
TR/L	M 000	08/17/2	18:09	LRW		2	00/00/00	\$0.00		(8)
TR/L	M 000	08/17/21	15:22	LRW		2	00/00/00	\$0.00	6	4
Se/e	n 000	08/17/21	15:20	TLR		2	00/00/00	\$0.00		1
Se/e	n 000	08/17/23	11:04	TLR		2	00/00/00	\$0.00		1
Ch/S	g 000	08/17/21	10:03	TLR		2	00/00/00	\$0.00	166/4	*
Ch/S	t 000	08/17/21	10:03	TLR		2	00/00/00	\$0.00	DIB New: ACT	,
		07/09/21				2	00/00/00	\$0.00		
		06/30/21				2	00/00/00	\$0.00		;
		06/29/21				2	00/00/00	\$0.00	32	+
		06/25/21				1	00/00/00	\$0.00	07/31/2018	
		05/26/21				2	00/00/00	\$0.00		
		05/25/21				2	00/00/00	\$0.00	PER TOM TO DO SO	
		05/25/21				2	00/00/00	\$0.00	PER TOM TO CALL HIM	
		05/25/21					00/00/00	\$0.00		
		04/15/21					00/00/00	\$0.00		
co/		04/14/21				1	00/00/00	\$0.00	MAILED ITM AND DIB CERTIFIED TO UPDATED ADDRESS	
LS/		04/14/21					00/00/00	\$0.00	#45 DISPUTE	
RC/1	1 000	04/14/21	13:08	LRW		3	00/00/00	\$0.00	DBR WANTS TOM # . SAYS THEY F ORWARED TOM EMAIL TO HIM.	
									HE IS NOT HAPPY. SAYS THIS MA DE HIM LOOK BAD ABOUT REFI AND	
TR/T	T 000	04/14/21	11.52	T.DW		р	00/00/00	00.00	HE IS STALLING WRITTEN IN LTR	
211, 21		01/11/11	11.50	TIKH		K	00/00/00	\$0.00	DBTR IS NOT HAPPY SAYS CL HAS BEEN SENDING STATEMENTS TO CA	90
TR/T	T 000	04/14/21	11:55	LRW		P	00/00/00	\$0.00	ADDY AND WE SHOULD HAVEGOTTEN NEW ADDY WHEN SENT TO US	
5500000 H5VI		7 0 C 4 7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					00,00,00	\$0.00	The state of the s	
									SAYS HE WILL PROVE THIS IS NO T DUE . THEY ARE TRYING TO GET HIM OFF THE BOARD .HMM	
TR/T1	000	04/14/21	11:49	LRW		R	00/00/00	\$0.00	DBTR GOT NEW ADDY SAYS CL HAS BEEN SENDING STATEMENTS TO HIM	i i
							,,	,	IN CA. TOLD HIM I WOULD GET INFO MAILED TO NEW ADDY IN CA	
									TOM SAYS EMAIL AMIE	
Ch/Al	L 000	04/14/21	11:36	LRW		R	00/00/00	\$0.00	Redacted by Plaintiff _{iOUTHLAKE} TX 76092	
RM/	000	04/13/21	16:32	LRW	01-0145	3	04/14/21	\$0.00		
Se/er	000	04/13/21	16:32	TLR		1	00/00/00	\$0.00		
		04/13/21				R	00/00/00	\$0.00		
co/		04/13/21				2	00/00/00	\$0.00	THIS COLLECTED	200
RM/	000	04/13/21	16:25	TLR	01-0145	2	04/13/21	\$0.00	CLIENT IS ASKING ABOUT THIS DETR. HE DISPUTED AND WE SENT	
									ITM AND DISPUTE RESPONSE. CALL HIM BUT BE VERY NICE AND SEE	
0-1				2000			5-305-31-0		WHERE WE ARE SITTING ON GETTIN	
		04/02/21					00/00/00	\$0.00	Make a service for the control of	
LS/		03/09/21					00/00/00	\$0.00	#50 DISPUTE FORM	
LS/		03/09/21					00/00/00	\$0.00	HAT DESCRIPTION	
		03/09/21					00/00/00		#45 DISPUTE	
		03/09/21					00/00/00 00/00/00	\$0.00	22/2	
		03/09/21					00/00/00	7.000000000	33/3 ACT New:DIB	
		03/09/21					00/00/00	\$0.00	UNDISPOTED	
CO/		03/09/21					00/00/00		DIB PER COLLECTOR	
TR/TT		03/09/21					00/00/00		DBTR IS DISPUTING BAL TOLD HI M HE WOULD GET STATEMENT AND H	
		21 22				50,14		,	E WOULD HAVE TO CALL ME TO RES OVE AFTER RECV STATEMENT	
TR/TT	000	03/09/21	14:45	LRW		R	00/00/00	\$0.00	DBTR IS STRAPPED FOR MONEY	
		03/09/21					00/00/00		DBTR IS DISPUTING THAT THE B AL SHOULD BE LOWER. THEY RECVD	
									LTR SHOWING IT WAS SENT HEREW	
RM/	000	03/09/21	14:02	AEE	01-0145	2	03/09/21	\$0.00	ADDED 2 PH#'S, ONE IS IN AI WINDOW	

Ch/Co 000 C3/05/21 03:22 TLR Document 174 Filed 12/01/23 Page 41 of 44 PageID 3504 : \$0.00 03/01/21 00:17 SCHD 00/00/00 \$0.00 #2 CREDIT NOTICE Se/en 000 02/27/21 09:06 TLR 1 00/00/00 \$0.00 #2 CREDIT NOTICE : \$0.00 01/29/21 23:29 SCHD 00/00/00 \$0.00 #114 FIRST DEMAND

Se/en 000 10/27/21 11:44 TLR

2 00/00/00

\$0.00

		0 08/31/5					00/00/00	\$0.00			
PO/G	I 000	08/88	3e14:52	2 Ŀĸ ₩\	/-00343-`	Y1	ം <mark>Dരായ</mark> ument 1	740.60	ledw1.21/01.623 no Page 43 of 44 Page	ageID 3506	
PO/G	I 000	08/28/2	1 10:51	LRW			00/00/00			3	
		0 08/25/2					Secretary of the second		SENT TEXT TO TOM TO SEE IF OK TO CALL		*
						2	00/00/00	\$0.00			*
TR/T	T 000	08/23/2	1 14:02	LRW		R	00/00/00	\$0.00	DBTR SAYS APFA WILL NOT DISCU SS THIS B	AL . CANNOT PAY UNTI	
									L HE IS ABLE TO TALK TO APFA. WANTS TO		
TR/L	M 000	08/23/2	1 11.02	T.DW		3	00/00/00	~~ ~~	IS INDEE TO TALK TO AFFA. WANTS TO	TALK TO APPA	
							00/00/00	\$0.00			1
		08/20/23				1	00/00/00	\$0.00			
TR/L	M 000	08/20/23	1 10:54	LRW		1	00/00/00	\$0.00			
TR/L	M 000	08/19/23	1 17:51	LRW		2	00/00/00	\$0.00			
RM/		08/19/21									
100000000000000000000000000000000000000					01-0145	2	08/23/21	\$0.00	CALL HIM		
		08/19/21				2	00/00/00	\$0.00			
TR/L	M 000	08/18/21	12:36	LRW		R	00/00/00	\$0.00			:
		08/18/21					00/00/00				
RM/								\$0.00			
12.00		08/17/21			01-0145	2	08/18/21	\$0.00			
TR/L	M 000	08/17/21	18:09	LRW		2	00/00/00	\$0.00			
TR/L	M 000	08/17/21	15:22	LRW		2	00/00/00	\$0.00			:
		08/17/21					and the Association of the Control o				:
							00/00/00	\$0.00			:
		08/17/21				2	00/00/00	\$0.00			
Ch/S	g 000	08/17/21	10:03	TLR		2	00/00/00	\$0.00	166/4		:
Ch/St	t 000	08/17/21	10:03	TLR		2	00/00/00	\$0.00	DIB New:ACT		
		07/09/21							DED MOW.RCI		
							00/00/00	\$0.00			
		06/30/21				2	00/00/00	\$0.00			;
Se/er	n 000	06/29/21	17:30	TLR		2	00/00/00	\$0.00			
Ch/CI	001	06/25/21	11:41	AEE		1	00/00/00	\$0.00	07/31/2018		
		05/26/21							0.732/2010		
No. 10 policy							00/00/00	\$0.00			
		05/25/21				2	00/00/00	\$0.00	PER TOM TO DO SO		
PO/GI	000	05/25/21	10:19	LRW		2	00/00/00	\$0.00	PER TOM TO CALL HIM		
Se/er	n 000	05/25/21	09:37	LRW		2	00/00/00	\$0.00			
		04/15/21									
							00/00/00	\$0.00			
co/	000	04/14/21	13:48	AEE		1	00/00/00	\$0.00	MAILED ITM AND DIB CERTIFIED TO UPDATED	ADDRESS	
LS/	000	04/14/21	13:41	AEE			00/00/00	\$0.00	#45 DISPUTE		
RC/TI	000	04/14/21	13:08	LRW		3	00/00/00	\$0.00	DBR WANTS TOM # . SAYS THEY F ORWARED TO	OM PMATE TO UTM	
100.00000						-	00,00,00	40.00			
									HE IS NOT HAPPY. SAYS THIS MA DE HIM LOC	OK BAD ABOUT REFI AND	
									HE IS STALLING WRITTEN IN LTR		
TR/TI	000	04/14/21	11:57	LRW		R	00/00/00	\$0.00	DBTR IS NOT HAPPY SAYS CL HAS BEEN SEND	ING STATEMENTS TO CA	*
									ADDY AND WE SHOULD HAVEGOTTEN NEW ADDY W		
ייים / ייים	000	04/14/21	11.55	TDM			00/00/00	** **			
INTI	. 000	04/14/21	11:55	LIKW		K	00/00/00	\$0.00	DBTR SAYS HE IS ON THE BOARD OF APFA . S		
									SAYS HE WILL PROVE THIS IS NO T DUE . TH	HEY ARE TRYING TO GET	
									HIM OFF THE BOARD . HMM		
TR/TT	000	04/14/21	11:49	LRW		R	00/00/00	\$0.00	DBTR GOT NEW ADDY SAYS CL HAS BEEN SEND	ING CTATEMNITE TO UTM	
		,				••	00,00,00	\$0.00			
									IN CA TOLD HIM I WOULD GET INFO MAILED	TO NEW ADDY IN CA	
									TOM SAYS EMAIL AMIE		
Ch/A1	000	04/14/21	11:36	LRW	1	R	00/00/00	\$0.00	2405 JOHNSON RD SOUTHLAKE TX 76092		
RM/	000	04/13/21	16:32	LRW	01-0145	3	04/14/21	\$0.00			
Se/en		04/13/21					00/00/00				
The State of the State of the								\$0.00			
2008		04/13/21			1	R	00/00/00	\$0.00			
co/	000	04/13/21	16:25	TLR		2	00/00/00	\$0.00	THIS COLLECTED		638
RM/	000	04/13/21	16:25	TLR	01-0145	2	04/13/21	\$0.00	CLIENT IS ASKING ABOUT THIS DBTR. HE DIS	SPINTED AND WE CENT	
								70.00			
									ITM AND DISPUTE RESPONSE. CALL HIM BUT E	SE VERY NICE AND SEE	* <
		to temperature and the second							WHERE WE ARE SITTING ON GETTIN		
Se/en	000	04/02/21	09:35	TLR	:	2	00/00/00	\$0.00			
LS/	000	03/09/21	23:08	SCHD		-	00/00/00	\$0.00	#50 DISPUTE FORM		
1000		03/09/21					No. of the contract of the con				
							00/00/00	\$0.00			
LS/		03/09/21				(00/00/00	\$0.00	#45 DISPUTE		
Se/en	000	03/09/21	15:59	AEE		1 (00/00/00	\$0.00			
Ch/Sq	000	03/09/21	15:43	AEE	1	1 (00/00/00	\$0.00	33/3		
		03/09/21					00/00/00				
Lance Barrier								\$0.00	ACT New:DIB		*0
		03/09/21			1	1 (00/00/00	\$0.00	UNDISPUTED		
co/	000	03/09/21	15:43	AEE	1	1 (00/00/00	\$0.00	DIB PER COLLECTOR	8	
TR/TT	000	03/09/21	14:51	LRW	1	R	00/00/00	\$0.00	DBTR IS DISPUTING BAL TOLD HI M HE WOULD	GET STATEMENT AND U	
					•						
mp /		00/00/-			ione.				E WOULD HAVE TO CALL ME TO RES OVE AFTER	ABCV STATEMENT	
		03/09/21			F	K (00/00/00	\$0.00	DBTR IS STRAPPED FOR MONEY		
TR/TT	000	03/09/21	14:43	LRW	I	2 (00/00/00	\$0.00	DBTR IS DISPUTING THAT THE B AL SHOULD B	E LOWER. THEY RECVD	
									LTR SHOWING IT WAS SENT HEREW		
		07/00/21	14.02	AEE	01-0145	2 /	03/09/21	\$0.00	ADDED 2 PH#'S, ONE IS IN AI WINDOW		
RM/	000	03/09/21						43.30			
RM/	000	03/09/21								APFA VI 000083	,

Ch/Co 000 03/09/21 09:22 TLR 2 00/00/00 \$0.00 01-0125

LS/ 000 03/01/23C001/12/25001/-00343-Y objectiment 1740.friled ch2/01/22CE Page 44 of 44 PageID 3507

Se/en 000 02/27/21 09:06 TLR 1 00/00/00 \$0.00

LS/ 000 01/29/21 23:29 SCHD 00/00/00 \$0.00 #114 FIRST DEMAND